

## REMARKS

Claims 1 - 24 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### REJECTION UNDER 35 U.S.C. § 102

Claims 1-24 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Hinata et al. (U.S. Pat. No. 6,882,390). This rejection is respectfully traversed.

Claims 1, 9, 17, and 24 recite a structure wherein a wiring pattern comprises a metal film formed of a same material as a light reflecting film. The side of the metal film rises in a substantially vertical direction. This side of the metal film is exposed from an inorganic insulated film. In this manner, the wiring pattern can be electrically connected to a base electrode through a side of the metal film. This is shown, for example, in Figure 5 of the present application where it can be seen that the wiring pattern 11 has a metal film 121 with sides 121A that rise in a vertical direction. The sides 121A are exposed from the inorganic insulating film 140 such that the wiring pattern 11 is electrically connected to the side 121A of the metal film 121. The Examiner alleges that such a configuration is anticipated by Hinata.

Notwithstanding, Applicant respectfully asserts that Hinata fails to teach such a structure. More specifically, referring to Figure 4A of Hinata, it can be seen that although a metal film 121 having sides that rise in a substantially vertical direction is shown. The sides of the metal film 121 are not exposed from the inorganic insulating

film 140. In contrast, the metal film 121 is completely covered by the inorganic insulating film 140. As such, the wiring pattern 11 cannot be electrically connected to the metal film 121, as claimed. Accordingly, Hinata fails to anticipate the claimed invention.

Claims 17 and 24 stand rejected under 35 U.S.C. 102(e) as being anticipated by Sakamoto et al. (U.S. Pat. No. 6,608,663).

As stated above, the claimed invention recites a structures wherein a metal film has sides that rise in a substantially vertically direction that are exposed from an inorganic insulating film. In this manner, the metal film can be electrically connected to an electrode formed thereon. The Examiner alleges that Sakamoto anticipates the claimed invention because Sakamoto allegedly teaches a metal film with sides exposed such that they are in contact with an electrode. Notwithstanding, Applicant respectfully asserts that Sakamoto fails to disclose such a structure.

More particularly, referring to Figure 6B of Sakamoto, it can be seen that Sakamoto teaches a metal film 602. The sides of the metal film 602, however, are not exposed from an inorganic insulating film 610. As such, the sides of the metal film 602 are completely covered by the insulating film 610. As such, Sakamoto also fails to disclose a configuration wherein the electrode 603 is electrically connected to the side of the metal film 602, as claimed. Sakamoto, therefore, fails to anticipate the claimed invention.

Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 20 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sakamoto et al. (U.S. Pat. No. 6,608,663). This rejection is respectfully traversed.

Claims 20 and 23 are dependent upon independent base claim 17. Claims 20 and 23 are neither anticipated nor obvious in view of Sakamoto for at least the same reasons as independent claim 17, addressed above.

Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

### **DOUBLE PATENTING**

The Examiner alleges that claims 1 – 24 are rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 7-8, 11-12, and 15-16 of U.S. Pat. No. 6,882,390 to Hinata. As stated above, however, Applicant respectfully asserts that Hinata does not anticipate the claimed invention. More particularly, Hinata fails to teach a structure wherein a metal film having sides rising substantially in a vertical direction are exposed from an inorganic insulating film such that a metal film is connected to an electrode. Because Hinata fails to anticipate such a structure, Applicant respectfully defers the filing of a Terminal Disclaimer.

### **CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests

that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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By:   
G. Gregory Schivley, Reg. No. 27,382  
Bryant E. Wade, Reg. No. 40,344

HARNESS, DICKEY & PIERCE, P.L.C.  
P.O. Box 828  
Bloomfield Hills, Michigan 48303  
(248) 641-1600

GGS/BEW/JAH